

LSDC- BALTIMORE
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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

HD
Rcv'd by: AN

Bianca A. Hughley

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-against-

Southwest Airlines

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Complaint for a Civil Case

Case No. MTM 25 CV 1031

(to be filled in by the Clerk's Office)

Jury Trial: ☒ Yes ☐ No
(check one)

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Bianca A. Hughley
Street Address	P.O. Box 24763
City and County	Middle River
State and Zip Code	Maryland, 21220
Telephone Number	646-623-0186
E-mail Address	bianca902@yahoo.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	Southwest Airlines
Job or Title (if known)	
Street Address	7 Saint Paul Street Suite 820
City and County	Baltimore
State and Zip Code	MD, 21202
Telephone Number	214.792.3572
E-mail Address (if known)	adria.jetton@wnco.com

Defendant No. 2

Name _____
Job or Title _____
(if known)
Street Address _____
City and County _____
State and Zip Code _____
Telephone Number _____
E-mail Address _____
(if known)

Defendant No. 3

Name _____
Job or Title _____
(if known)
Street Address _____
City and County _____
State and Zip Code _____
Telephone Number _____
E-mail Address _____
(if known)

Defendant No. 4

Name _____
Job or Title _____
(if known)
Street Address _____
City and County _____
State and Zip Code _____
Telephone Number _____
E-mail Address _____
(if known)

(If there are more than four defendants, attach an additional page providing the same information for each additional defendant.)

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

- ☒ Federal question ☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

The Railway Labor Act (RLA) 45 U.S.C. §§ 151-165.

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, (name) _____, is a citizen of
the State of (name) _____.

b. If the plaintiff is a corporation

The plaintiff, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, (name) _____, is a citizen of the State of (name) _____. Or is a citizen of (foreign nation) _____.

b. If the defendant is a corporation

The defendant, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____. Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

Ms. Hughley's annual salary would have been estimated at over \$40,000 per year. Ms. Hughley was terminated in November 2022. Ms. Hughley's estimated loss of income exceeds \$100,000.

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

Southwest Airlines violated several sections of The Railway Labor Act (RLA) when they terminated Ms. Hughley in November 2022. Ms. Hughley was denied grievance procedures; which is a direct violation of The RLA. Ms. Hughley later discovered that all probationary Flight Attendants were denied grievance procedures from 2013, which is a gross violation of the RLA. Southwest Airlines and TWU 556 ratified the Flight Attendant contract in 2024 and the new contract is also in violation of the RLA in regards to grievance procedures.

The Railway Labor Act (RLA) 45 U.S.C. §§ 152 Violations:

Violation First: Duty of carriers and employees to settle disputes. Southwest does not have grievance procedures for probationary Flight Attendants. Ms. Hughley was denied grievance procedures by Human Resources Mandy Vitela, Sonya Lecore President of Inflight, and Brian Ridgeway Vice President of Inflight. This is a gross violation because it involves a large group of employees and is a willful failure or refusal to follow the RLA.

Violation Second. Consideration of disputes by representatives. Ms. Hughley initially used the TWU 556 for assistance with the grievance procedures and was denied. There was no consideration for the grievance request.

Violation Third. Designation of representatives. Ms. Hughley continued to try to grieve her termination on her own and was ignored. Ms. Hughley is allowed to represent herself under the RLA and was ignored.

Violation Sixth. Conference of representatives; time; place; private agreements. Since Ms. Hughley's initial grievance was denied. Southwest is also in violation of 152 Sixth for not responding within 10 days of a time receipt of grievance of a place for a conference to be held.

Violation Seventh. Change in pay, rules, or working conditions contrary to agreement or to section 156 forbidden. Ms. Hughley was required to attend a fact-finding meeting while on a leave of absence granted by the Legal Department, without pay; which was a change in the work rules, working conditions, and pay outlined in the CBA.

Violation Eighth. Notices of manner of settlement of disputes; posting. Southwest has not posted this agreement within the confines of BWI Flight Attendant Lounge or within the TWU 556 CBA.

Violation Tenth. Violations; prosecution and penalties. Southwest willful failure or refusal to comply with the statutory requirements of the RLA; which can result in fines up to \$20,000 or imprisonment.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages. For any request for injunctive relief, explain why monetary damages at a later time would not adequately compensate you for the injuries you sustained, are sustaining, or will sustain as a result of the events described above, or why such compensation could not be measured.

Ms. Hughley is seeking 5 million dollars in damages for the willful refusal of Southwest Airlines to follow the statutory requirements of the RLA. The 2024 ratification of TWU 556 CBA still includes the same verbiage and lack of guidelines for probationary Flight Attendants to file grievances. These damages include reinstatement, back pay, past benefits, retirement contributions, fines, and injunctions allowed within the RLA.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: March 28, 2025.

Signature of Plaintiff

Printed Name of Plaintiff

Bianca A. Hughley

(If more than one plaintiff is named in the complaint, attach an additional certification and signature page for each additional plaintiff.)

B. For Attorneys

Date of signing: _____, 20__.

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Address

Telephone Number

Email Address